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Attorneys for Plaintiffs,
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOANNA ARDALAN, ESQ, an individual;
ONE LLP, a California Limited Liability
Partnership,

Plaintiff,

v.

DOE 1, d.b.a LAW INTEGRAL, LLC,
business entity unknown; DOE 2, d.b.a
DEPUTY TRADEMARK, business entity
unknown; DOE 3, p.k.a MICHELLE
SPRAGUE, an individual; DOE 4, d.b.a
TRADEMARK INTEGRAL, business
entity unknown; DOE 5, d.b.a
BRANDREGISTRATION.ORG, business
entity unknown; and DOES 6 through 10,
inclusive,

Defendants.

Case No. 8:23-cv-01243-DOC-DFM

**DECLARATION OF JOANNA
ARDALAN IN SUPPORT OF
PLAINTIFFS' EX PARTE
APPLICATION FOR SERVICE
BY EMAIL**

DECLARATION OF JOANNA ARDALAN

I, Joanna Ardalan, declare as follows:

1. I am the Plaintiff in the above titled action. I have personal knowledge of the facts stated herein and, if called to testify, could and would competently testify thereto.

2. On June 21, 2023 I was contacted by a trademark registration applicant named Walter Ekins, who was inquiring about an inaccurate trademark filing that was filed through LawIntegral.com.

3. Ekins provided me with email correspondence Ekins had with a representative for Defendant Law Integral, LLC (“Integral”) as well as a trademark filing that was filed by Integral on his behalf. A true and correct copy of this email correspondence is attached hereto as Exhibit A. A true and correct copy of the trademark filing Integral filed on behalf of Ekins is attached hereto as Exhibit B.

4. Following Mr. Ekins contact, I conducted an online investigation into whether there have been any instances of other victim’s who have been harmed by Integral through the use of my identity. This search revealed that Integral has used my identity before, when I discovered a thread on the website <https://www.justanswer.com/intellectual-property-law/m6awz-spent-almost-7-000-paying-company-trademark.html> (“Just Answer URL”), where one of Integral’s customers complained of Integral’s subpar trademark registration work and said that I was Integral’s “head IP attorney”, listing my California State Bar Number. The customer complained of the \$7000.00 she spent on her legal services. A true and correct screenshot of the now taken down webpage at the Just Answer URL is attached hereto as Exhibit C.

5. On July 5, 2023, I was contacted by another one of Defendants’ defrauded customers regarding legal services he received from Defendants. The Defendants there used my name to sign a cease-and-desist letter (by email) and send email correspondence to those customers. A true and correct copy of the email

1 correspondence is attached hereto as Exhibit D. A true and correct copy of the
2 cease-and-desist letter is attached hereto as Exhibit E.

3 6. At no time have I ever worked with or on behalf of any of the Defendants in
4 any capacity whatsoever.

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6 I declare under penalty of perjury that the foregoing is true and correct.

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8 Executed this 18th day of July 2023, in Los Angeles, California.

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10 /s/ Joanna Ardalan

11 Joanna Ardalan
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